

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO, ET
AL.,

Defendants.

No. 12-cv-2039 (GAG)

**MOTION REQUESTING ORDER APPROVING THE
JOINT STIPULATION ON THE
TECHNICAL COMPLIANCE ADVISOR'S FIELD ASSESSMENT ACTIVITIES**

COMES NOW, Plaintiff, the United States of America, and respectfully requests an Order approving the Joint Stipulation on the Technical Compliance Advisor's Field Assessment Activities (Joint Stipulation). The Technical Compliance Advisor (TCA) concurs with the Joint Stipulation. For cause, the United States alleges and states as follows:

1. On July 21, 2017, the Parties entered into a stipulation on the field assessment activities of the TCA after obtaining the TCA's input through the exchange of written comments and two in-person meetings. ECF No. 570. The TCA did not concur with the Parties' initial stipulation.

2. On July 24, 2017, the Court directed the Parties to meet on or before August 1, 2017, with the TCA's counsel to continue negotiations on the stipulation. ECF. No. 572. The Parties met in-person with the TCA's counsel on July 31, 2017, in compliance with the Court's Order, and worked in good faith to reach an agreement on the TCA's field assessment activities.

3. The attached Joint Stipulation is the product of the fruitful discussions between the Parties and the TCA's counsel on July 31, 2017. The Joint Stipulation is intended to guide

the TCA's field assessment activities during public events that involve a law enforcement response from the Puerto Rico Police Department, such as demonstrations, protests, or other crowd events, in compliance with the Agreement for the Sustainable Reform of the Puerto Rico Police Department. *See* ECF No. 60. The Joint Stipulation is signed by the Parties and the TCA's counsel, as authorized representative of the TCA, in compliance with the Court's July 24 Order. *See* ECF No. 572

4. The United States is filing the instant Motion and the attached Joint Stipulation in restricted mode for viewing by the Court, the Parties, and the TCA only, in compliance with the Court's July 24 Order. *See id.*

WHEREFORE, the United States respectfully requests an Order approving the Joint Stipulation.

Respectfully submitted, this 9th day of August, 2017,

JOHN M. GORE
Acting Assistant Attorney General

STEVEN H. ROSENBAUM
Chief

S/ Luis E. Saucedo
TIMOTHY MYGATT
Deputy Chief
LUIS E. SAUCEDO
Counselor to the Chief
BRIAN BUEHLER
LYNDA GARCIA
SETH WAYNE
Trial Attorneys
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530
Tel: (202) 598-0482

Fax: (202) 514-4883
luis.e.saucedo@usdoj.gov

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion in Compliance was filed electronically on this 9th day of August, 2017, with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

S/ LUIS E. SAUCEDO
LUIS E. SAUCEDO
Counselor to the Chief
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530
Tel: (202) 598-0482
Fax: (202) 514-4883
Email: luis.e.saucedo@usdoj.gov

Attorney for Plaintiff